

**REMARKS**

Claims 1-7 are pending in this application. Claim 1 is independent.

**Claim Rejection – 35 USC 102(e)**

Claims 1-5 have been rejected under 35 U.S.C. 102(e) as being anticipated by Gotoh et al. (U.S. Patent 6,292,625, “Gotoh”). Applicant respectfully traverses this rejection.

Claim 1 recites a step of “pre-defining an area on the disk medium as a directory.” The Office Action states that Gotoh teaches this step as step B3 (in Figure 2) and the data structure C2 (in Figure 3), the continuous area at LBN 83 to end, and the directory being the Root directory in Figure 8). In other words, the Office Action appears to state that the area LBN 83 to end has been pre-defined as a directory, i.e., the Root directory. Applicant disagrees.

Gotoh’s directory descriptor for the Root directory does not pre-define an area on the disk. In recording a directory file, the file recording operation is performed based on the conventional file system of ISO 13346 (column 6, lines 46-48; column 10, lines 55-59). The conventional ISO standard is also disclosed in the present application with respect to the UDF file system shown in Figure 2. Based on ISO 13346, in a

directory, the file names of the files included in the directory and the location information of the file entries are recorded (column 7, lines 9-12). A directory file has a plurality of file identifier descriptors, and each file identifier descriptor includes the recording address and the file name of the file entry of the file or directory managed by the directory (column 8, lines 4-7).

As an example, the recording location of the file entry for the AV file Movie 1.VOB is stored as a file identifier descriptor in the DVD\_VIDEO directory file. The recording location of the file entry for the DVD\_VIDEO directory file is stored as a file identifier descriptor in the ROOT directory file (column 7, lines 58-63). The recording location of the file entry for the Root directory file is stored in a file set descriptor and the file set descriptor is recorded in a predetermined location as a part of the file management information. Unallocated LBN's on the DVD-RAM (LBN 586 to 3584 and LBN 3888 to end) can be specified for recording an AV file so that the recording is made from the beginning of the ECC block (Figure 9; column 10, lines 7-13).

Thus, it can be seen that Gotoh discloses the conventional approach of indicating file names and file location information in a directory file. In other words, in Gotoh the file name and location information have to be recorded in the directory file before the logical blocks designated for the file become part of the directory. Also, as is

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stated in the present application, LBN's are logical entities and control thereof is not ensured to be within a physical area on a disk. On the other hand, in the present invention recording of files and directories is within an area on the disk defined as a directory. Furthermore, Gotoh does not teach, for example, pre-defining the sequence LBN 83 to end as the Root directory and recording the directory A within that pre-defined sequence. Rather the directory A becomes part of the Root directory after an entry is made in the Root directory file. *Fig 21*

Therefore, Applicant submits that Gotoh fails to teach or suggest the method steps of claim 1, comprising pre-defining an area on the disk medium as a directory and recording files and directories with the area defined as the directory.

The same argument applies as well to claim 2. Claim 2 recites hierarchically pre-defining a further directory in an area within the area pre-defined on the disk medium as the directory. Again, because Gotoh teaches directory name and directory location as the mechanism for designating the area associated with the directory as part of a parent directory, it does not teach defining a directory within an area pre-defined as a directory. In the example described in the Office Action, the directory A and the file B do not become part of the Root directory until after they are recorded in the Root directory file.

With respect to claim 3, because Gotoh does not teach a pre-defined area as a directory, it also does not teach a step of deciding whether the area is pre-defined or not. It may be true that Gotoh teaches defining a directory under a directory in a hierarchical fashion. However, relying on the ISO standard, the lower directory becomes part of the higher directory after the lower directories information is recorded in the higher directories file.

With respect to claim 4, Gotoh does not teach restriction of a pre-defined area for a directory to be within a pre-defined area. Being based on the ISO standard, formation of a subdirectory in Gotoh is not restricted to a pre-defined area.

With respect to claim 5, since Gotoh fails to teach a pre-defined area, it also does not teach a pre-defined area as continuously arranged.

**Claim Rejection – 35 USC 103**

Claims 6 and 7 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Gotoh et al. in view of Walker (U.S. Patent 6,134,586). Applicant respectfully traverses this rejection.

The Office Action admits that Gotoh fails to teach the additional limitation expressed in claims 6 and 7. Instead the Office Action relies on Walker for making up for the deficiency.

However, Walker also does not teach pre-defining an area on the disk as a directory and recording files and directories within the defined area. Thus, Walker fails to make up for the deficiency in Gotoh. At least for this reason, Applicant submits that the rejection fails to establish *prima facie* obviousness for claims 6 and 7.

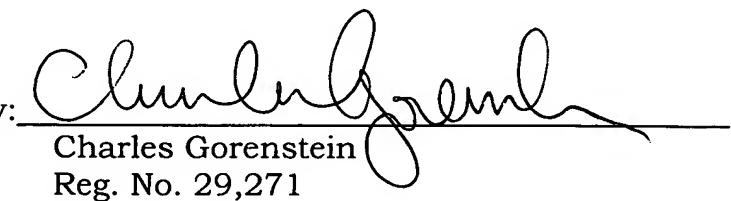
**CONCLUSION**

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance and such allowance is respectfully solicited. Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Robert W. Downs (Reg. No. 48,222), to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1. 17; particularly, extension of time fees.

Respectfully submitted,

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